



iowa department of environmental quality

reply to: James Humeston phone: 515/281-8884

November 5, 1981

RECORD COPY

Canders Initials

Barney Skiles, Plant Engineer Waterloo Industries, Inc. 300 Ansborough Avenue P.O. Box 2095 Waterloo, IA 50704

Dear Mr. Skiles:

This letter is in response to your request to be exempted from the RCRA regulations. We agree the waste paint sludge is nonhazardous. The issue that must be resolved is the classification of the spent solvents. We are not convinced USEPA's interpretation of the RCRA regulations concerning the classification of solvents recycled by Safety-Kleen/Hydrite Chemical Company is correct. We are currently trying to resolve this issue through the USEPA offices in Kansas City and Washington.

You will be notified when this issue is finally resolved since the outcome will directly affect the activities you must conduct to manage the waste streams generated at your facility. In the interim, we are delaying the processing of your exemption request and compliance with the items indicated in the June 29th hazardous waste facility inspection.

If you have any questions concerning this letter, do not hesitate to contact this office directly.

Sincerely,

AIR & LAND QUALITY DIVISION

James R. Humeston Environmental Specialist

Land Operations

JRH:mla/SWW309F03.01

cc: DEQ Regional Office No. 1, Manchester

RCRA RECORDS CENTER

Main Office: Henry A. Wallace Building, Des Moines, Iowa 50319